

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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EDWARD SHAMOON, Derivatively  
and on Behalf of Nominal Defendant  
LANNETT COMPANY, INC.,

Plaintiff,

v.

ARTHUR P. BEDROSIAN, MARTIN P.  
GALVAN, JOHN KOZLOWSKI,  
JEFFREY FARBER, DAVID DRABIK,  
PAUL TAVEIRA, JAMES M. MAHER,  
and ALBERT PAONESSA, III,

Defendants,

and

LANNETT COMPANY, INC., a Delaware  
Corporation,

Nominal Defendant.

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Civil Action No. 2:18-cv-03070-WB

Judge Wendy Beetlestone

**NOTICE OF VOLUNTARY DISMISSAL OF ACTION PURSUANT TO F.R.C.P. 41(a)(1)**

Plaintiff Edward Shamoan (“Plaintiff”) hereby gives notice of his voluntary dismissal of all of the above-captioned Defendants and the above-captioned action (the “Action”), pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure. Plaintiff recently sold all of his shares in Lannett Company, Inc. (“Lannett”), and accordingly, no longer has standing to bring this shareholder derivative suit. *In re Massey Energy Co. Derivative & Class Action Litig.*, 160 A.3d 484, 497 (Del. Ch. 2017) (“[S]tockholders of Delaware corporations must hold shares not only at the time of the alleged wrong, but continuously thereafter throughout the litigation in order to have standing to maintain derivative claims.”).

Dismissal under Rule 41(a)(1) is appropriate because Defendants have not filed an answer to the complaint or motion for summary judgment as of this time.

Dated: May 17, 2019

Respectfully,

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

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*Counsel for Plaintiff Edward Shamoon*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 17, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Geoffrey M. Johnson  
Geoffrey M. Johnson (*pro hac vice*)